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Attorneys for Plaintiffs

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA**

In re:

MARC JOHN RANDAZZA

Debtors.

Case No BK-15-14956-ABL

Chapter 11

EXCELSIOR MEDIA CORP., a Nevada
Corporation; and LIBERTY MEDIA
HOLDINGS, LLC, a Nevada Limited
Company,

Plaintiffs,

V.

MARC JOHN RANDAZZA, an individual,

Defendant.

Adversary Proceeding No.
15-01193-ABL

**EX PARTE MOTION TO EXCEED
PAGE LIMIT PURSUANT TO
LOCAL RULE 9014(E)(1) FOR
PLAINTIFFS' OPPOSITION TO
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

**Hearing Date: N/A
Hearing Time: N/A**

Plaintiffs Excelsior Media Corp. ("Excelsior") and Liberty Media Holdings, LLC., ("Liberty" and, collectively with Excelsior, "Plaintiffs"), by and through their counsel, James D. Greene, Esq., of Greene Infuso, LLP, hereby file their Ex Parte Motion to Exceed Page Limit Pursuant to Local Rule 9014(E)(1) for Plaintiffs' Opposition to Defendant's Motion for Partial Summary Judgment ("MPSJ") (Docket No. 146).

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1 Good cause exists to extend the page limit for Plaintiffs' Opposition. First, the Court has
2 granted Defendant similar relief multiple times previously in this adversary proceeding (ECF Nos.
3 41,127 and 152). Second, Defendant's MPSJ is itself 52 pages in length and is accompanied by a
4 15-page statement of facts and an annex of 30 exhibits totaling over 500 pages. It would be
5 impossible to adequately respond in the 20 pages permitted by Local Rule 9014(e)(1). Third, this
6 is a complicated adversary proceeding involving two different theories of nondischargeability
7 (*i.e.*, 11 U.S.C. §§ 523(a) (a)(4) and (a)(6)), and a highly complex factual scenario. Fourth,
8 according to Defendant, the Plaintiffs' claims at issue in the adversary proceeding were one of the
9 principal reasons Defendant chose to file his bankruptcy case, and they may have a significant
10 impact on his case overall. Finally, extensive briefing on this important matter will enable the
11 Court to be better prepared for the hearing and to render an ultimate decision. In sum, good cause
12 exists to grant the Plaintiffs leave from the permissible page limits and allow their Reply to be
13 filed up to 50 pages in length.

14 WHEREFORE, Plaintiffs respectfully request that the Court enter an order, in the form as
15 attached hereto as **Exhibit 1**, granting this relief pursuant to LR 9014(e)(1) to file their
16 Opposition up to and including 50 pages in length.

17 DATED this 15 day of May, 2017.

18 GREENE INFUSO, LLP

19 /s/ James D. Greene

20 James D. Greene, Esq.

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CERTIFICATE OF SERVICE

I am employed by the law firm of Greene Infuso, LLP in Clark County. I am over the age of 18 and not a party to this action. My business address is 3030 South Jones Boulevard, Suite 101, Las Vegas, Nevada 89146.

On May 15, 2017 I served the document(s), described as:

EX PARTE MOTION TO EXCEED PAGE LIMIT PURSUANT TO LOCAL RULE 9014(E)(1) FOR PLAINTIFFS' OPPOSITION TO MOTION FOR PARTIAL SUMMARY JUDGMENT

☒ by placing the ☐ original ☒ a true copy thereof enclosed in a sealed envelope addressed as follows

☐ a. ECF System (*You must attach the "Notice of Electronic Filing", or list all persons and addresses and attach additional paper if necessary*)

☒ b. BY U.S. MAIL. I deposited such envelope in the mail at Las Vegas, Nevada. The envelope(s) were mailed with postage thereon fully prepaid.

Zachariah Larson, Esq.
Matthew Zirzow, Esq.
LARSON & ZIRZOW, LLC
850 E. Bonneville Ave.
Las Vegas, Nevada 89101

I am readily familiar with Greene Infuso, LLP.'s practice of collection and processing correspondence for mailing. Under that practice, documents are deposited with the U.S. Postal Service on the same day which is stated in the proof of service, with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date stated in this proof of service.

☐ c. BY PERSONAL SERVICE.

☐ d. BY DIRECT EMAIL

☐ e. BY FACSIMILE TRANSMISSION

I declare under penalty of perjury that the foregoing is true and correct.

Dated, this 15 day of May, 2017

/s/ Frances M. Ritchie
An employee of Greene Infuso, LLP